

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

DENISE BAKER,
*For herself and on behalf of all
similarly situated individuals,*

Plaintiff,

v.

Case No.: 1:17-cv-1160 (LMB/JFA)

NAVIENT SOLUTIONS, LLC

Defendant.

**PLAINTIFF'S MOTION FOR AN AWARD OF ATTORNEYS' FEES
AND PAYMENT OF COSTS AND LITIGATION EXPENSES AND
FOR A CLASS REPRESENTATIVE SERVICE AWARD**

Pursuant to Federal Rules of Civil Procedure 23(h) and 54(d) and this Court's Preliminary Approval Order dated July 3, 2018, Plaintiff moves this Court for entry of an Order awarding (i) attorneys' fees in the amount \$833,333.33, being one third of the Settlement Fund; (ii) payment of costs and litigation expenses incurred by Plaintiffs' counsel in the amount of \$24,379.83; and (iii) payment of a service award to the named Plaintiff and class representative, Denise Baker, in the amount of \$15,000.00.

The grounds for this motion are set forth in Plaintiff's accompanying Memorandum in Support. A proposed order encompassing both this motion and the motion for final approval will be presented with the filing of the motion for final approval.

Date: October 31, 2018

Respectfully submitted,

DENISE BAKER

By: /s/ William L. Downing
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CERTIFICATE OF SERVICE

I hereby certify that on the 31st day of October, 2018, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following counsel of record:

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